IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

In re:)
DIGITAL INK, INC., AND CHRISTOPHER DAVID MCGINNIS,	Case No. 18-30056-KLP Chapter 7 (Jointly Administered)
Debtors.) _)
HARRY SHAIA, JR., Trustee,)))
Plaintiff, v.) Adv. Pro. No. 18-03098-KLP
BMST, INC.,)
Defendant.)) _)

DEFENDANT'S MOTION TO DISQUALIFY HARRY SHAIA, JR. AS TRUSTEE OF THE BANKRUPTCY ESTATE OF DIGITAL INK, INC., HARRY SHAIA JR. AS THE TRUSTEE OF THE BANKRUPTCY ESTATE OF CHRISTOPHER DAVID McGINNIS, AND THE LAW FIRM OF KEPLEY BROSCIOUS & BIGGS, PLC

Defendant, BMST, Inc., by counsel, pursuant to 11 U.S.C. § 324 moves to disqualify Harry Shaia, Jr., as the Chapter 7 Trustee of the Bankruptcy Estate of Digital Ink., Inc., Harry Shaia, Jr., as the Chapter 7 Trustee of Christopher David McGinnis, and the law firm of Kepley Broscious & Biggs, PLC. In support of this motion, BMST, Inc. submits its memorandum of law filed simultaneously with this motion.

Robert S. Westermann (VSB No. 43294)

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Dated: June 17, 2019 Respectfully submitted,

BMST, INC.

/s/ Franklin R. Cragle, III

Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2019, a true and complete copy of the foregoing was filed and served electronically using the Court's ECF System and was also sent by e-mail as follows:

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Counsel for Harry Shaia, Jr., Trustee

In addition, I hereby certify that on June 17, 2019, a true and complete copy was sent via first-class mail, postage pre-paid and addressed as follows:

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